

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JAMIE LEE ANDREWS, as	*	
Surviving Spouse of	*	
MICAH LEE ANDREWS, Deceased,	*	CIVIL ACTION FILE
and JAMIE LEE ANDREWS, as	*	
Administrator of the Estate of	*	NO.1:14-CV-3432-SCJ
MICAH LEE ANDREWS, Deceased,	*	
Plaintiff,	*	
	*	
v.	*	
	*	
AUTOLIV JAPAN, LTD.,	*	
	*	
Defendant.	*	

NOTICE OF DEPOSITION OF ELIZABETH RAPHAEL

**TO: Elizabeth Raphael
c/o Doug Scribner, Esq.
Alston & Bird LLP
One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309-3424**

Plaintiff in the above-captioned matter and hereby notices the deposition of Elizabeth Raphael. The deposition will begin Thursday, November 15, 2018 at 10:30 a.m. at Alston & Bird LLP, 560 Mission Street, Suite 2100, San Francisco, CA 94105. The deposition will be by oral examination, on cross-examination, before an officer duly authorized to administer oaths for all purposes permitted by

the Federal Rules of Civil Procedure and will be recorded by stenographic and video means.

The witness is hereby directed to bring to the deposition those items identified in the Schedule A of Documents attached hereto.

Respectfully submitted this 23rd day of October, 2018.

BUTLER WOOTEN & PEAK LLP

BY: s/ Tedra L. Cannella

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ATTORNEYS FOR PLAINTIFF

SCHEDULE “A” OF DOCUMENTS

1. All correspondence generated or received in connection with this case.
2. Copies of all résumés used by you in connection with your consulting, academic or other professional endeavors.
3. Any and all contracts, budgets, memorandums of understanding, or any other document that outlines the scope of your work in this case, between you or your employer and any Defendant in this case (including its subsidiaries, parent, or related companies) or its attorneys or representatives.
4. The entire file generated in this case. This includes all documents you have generated, reviewed, **OR** received in connection with this case, and any transmittal letters or emails accompanying them. It also includes copies of documents that contain any handwritten or typed notations or highlights on them.
5. All files and documents generated, received, **OR** relied on in connection with this case, but not contained in this case file.
6. All documents you have generated, reviewed, received, **OR** relied on in connection with this case.
7. Your billing records for this case.
8. Any demonstrative exhibits you will use at the trial of this case.

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rules 5.1(B) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font and size requirements and is formatted in Times New Roman, 14 point font.

s/ Tedra L. Cannella

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CERTIFICATE OF SERVICE

This is to certify that on October 23, 2018, I electronically filed NOTICE OF DEPOSITION OF ELIZABETH RAPHAEL with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Douglas G. Scribner, Esq.
Jenny A. Mendelsohn, Esq.
William J. Repko III, Esq.
Alston & Bird LLP
One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309-3424

This 23rd day of October, 2018.

BY: s/ Tedra L. Cannella _____
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